

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Victorina ALTAMIRANO-Hernandez (20)

Tehuacan, Puebla, Mexico

Case No.

L-22-MJ-

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 25, 2022 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 USC 1001

Offense Description

Whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully

- (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;
- (2) makes any materially false, fictitious, or fraudulent statement or representation; or
- (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.

This criminal complaint is based on these facts:

On or about August 25, 2022, at approximately 5:12 pm., defendant, Victorina ALTAMIRANO-Hernandez, a citizen & national of Mexico applied for admission into the United States at the Gateway to the Americas Port of Entry in Laredo, Texas, as a pedestrian. At primary inspection, defendant presented to CBP Officer Camelia C. Cardenas, a Texas Identification Card bearing the name & photograph of L.B.R. claiming to be such person & a United States Citizen headed to Laredo, Texas. CBP Cardenas noticed facial inconsistencies between the defendant & the picture on the document presented. Defendant was referred to secondary for further inspection. At secondary, the name on the Texas ID was queried & it was discovered that the person in the ID had a prior arrest. The defendant was asked if she had ever been arrested & she replied "no". Under a sworn statement, the defendant identified herself as Victorina ALTAMIRANO-Hernandez, a citizen & national of Mexico born in Tehuacan, Puebla, Mexico. Defendant admitted she is not a United States Citizen & that she is not the person on the Texas Identification Card she had presented at primary inspection. Facts are based on the defendant's sworn statement & records of U.S. Customs & Border Protection. The defendant was paroled into the United States & an Immigration hold has been placed.

☐ Continued on the attached sheet.

/s/ Jose C. Luna

Complainant's signature

Jose C. Luna, CBP Enforcement Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: August 29, 2022

Judge's signature

City and state: Laredo, Texas

Christopher Dos Santos, U.S. Magistrate Judge

Printed name and title